

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	[PROPOSED] REVISED CASE
CORRECTIONS CORPORATION OF)	MANAGEMENT ORDER
AMERICA, et al.,)	
Defendants.)	
_____)	

Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), and Defendants CoreCivic, Inc., formerly known as Corrections Corporation of America (“CoreCivic” or the “Company”), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin (collectively, “Defendants”) submit the following [Proposed] Revised Case Management Order.

WHEREAS, under the current case management order (ECF Nos. 180-181), the fact discovery cutoff is April 17, 2020, and the parties seek to complete discovery in this action, including depositions, as efficiently as possible;

WHEREAS, the current outbreak of the Coronavirus Disease (also known as COVID-19) and the efforts to prevent the spread of that disease have already caused administrative disruptions and are expected to continue to impact the ability of counsel to complete the necessary discovery by the current deadline;

WHEREAS, the Parties reserve the right to seek additional modifications of the case schedule in the event that the current outbreak does not dissipate; and

WHEREAS, the Parties have met and conferred and agreed, subject to approval of the Court, on the following deadlines to govern the remainder of the case:

Matter	Existing Date	New Date
Fact Discovery Cutoff	April 17, 2020	June 16, 2020
Deadline to Submit Joint Mediation Report	April 20, 2020	June 19, 2020
Deadline for Filing of Discovery-Related Motions	May 8, 2020	July 10, 2020
The Parties Declare Experts and Produce Expert Reports Pursuant to Fed. R. Civ. P. 26(a)(2)	June 12, 2020	July 10, 2020
• Rebuttal	July 24, 2020	August 21, 2020
• Completion of Expert Depositions	September 4, 2020	October 2, 2020

Matter	Existing Date	New Date
Dispositive & <i>Daubert</i> Motions		
• Opening Briefs	October 16, 2020	November 13, 2020
• Oppositions	December 18, 2020	January 15, 2021
• Replies	January 22, 2021	February 19, 2021
Information Exchange	April 13, 2021	May 13, 2021
Motions in Limine	April 16, 2021	May 14, 2021
Motion in Limine Responses	April 27, 2021	May 27, 2021
Pretrial Filings	April 27, 2021	May 27, 2021
Pretrial Order	April 27, 2021	May 31, 2021
Pretrial Conference	April 30, 2021	June 11, 2021
Trial	May 18, 2021	July 6, 2021

DATED: March 20, 2020

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ENTERED this ____ day of March, 2020

THE HONORABLE ALETA A. TRAUGER
UNITED STATES DISTRICT JUDGE

Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al**Electronic Mail Notice List**

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